

E-Filing

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10 Attorneys for Defendant
JOSEPH B. EISENBERG

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13
14 IN RE RUBBER CHEMICALS LITIGATION

MDL Document No. C 04-1648 (MJJ)

15 THIS DOCUMENT RELATES TO:

Case No. C 06-5700 (MJJ)

16 BRIDGESTONE AMERICAS HOLDING,
17 INC., BRIDGESTONE FIRESTONE NORTH
AMERICAN TIRE, LLC, BANDAG
18 INCORPORATED, and PIRELLI TIRE, LLC

STIPULATION TO EXTEND BRIEFING
SCHEDULE PURSUANT TO CIVIL
LOCAL RULE 6-2 AND ~~PROPOSED~~
ORDER

19 Plaintiffs,

20 v.

21 CHEMTURA CORPORATION, UNIROYAL
CHEMICAL COMPANY, INC., JAMES J.
22 CONWAY, JOSEPH B. EISENBERG,
MICHAEL J. DUCHESNE and PETER D.
23 WELCH

24 Defendants.

25 Pursuant to Civil Local Rule 6-2 of the United States District Court for the Northern
26 District of California, counsel for Plaintiffs Bandag, Incorporated and Pirelli Tire, LLC
27 (collectively, "Plaintiffs") and counsel for Defendants Michael J. Duchesne, Joseph B.
28

1 Eisenberg, and Peter D. Welch, and James J. Conway (collectively, "Defendants") submit this
 2 Stipulation and [Proposed] Order:

3 WHEREAS, Plaintiff's action, *Bridgestone Americas Holding, Inc., et al. v. Chemtura*
 4 *Corporation, et al.*, was transferred from the Middle District of Tennessee pursuant to 28 U.S.C.
 5 § 1407(c) and docketed with this Court on September 19, 2006;

6 WHEREAS, an amended complaint was filed on September 22, 2006;

7 WHEREAS, Defendants each individually filed a motion to dismiss the complaint on
 8 January 16, 2007;

9 WHEREAS, pursuant to the Stipulation and Order dated January 24, 2007 and ordered
 10 February 5, 2007, the hearing on the motions to dismiss was continued to March 6, 2007 and
 11 Defendants were accordingly required file and serve their reply briefs on or before February 20,
 12 2007;

13 WHEREAS, pursuant to Notice by the Clerk of this Court, the motions to dismiss were
 14 reset to April 18, 2007;

15 WHEREAS, the parties have agreed to an extension of time for the filing on the reply
 16 briefs to take into account the intervening federal holiday and the resetting of the hearing on the
 17 motions to dismiss;

18 NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED BETWEEN THE
 19 PARTIES, BY AND THROUGH COUNSEL OF RECORD, THAT:

20 Defendants shall file and serve their reply briefs on or before March 13, 2007.

21 **IT IS SO STIPULATED.**

22 Dated: February 20, 2007

CROWELL & MORING LLP

23 *R. Scott Feldmann*

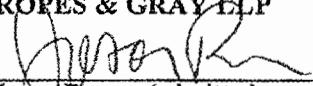
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Attorneys for Bandag, Incorporated and Pirelli Tire,
LLC

Dated: February 20, 2007

ROPES & GRAY LLP

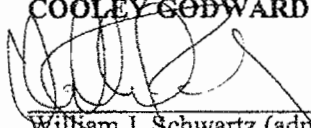


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Dated: February 20, 2007

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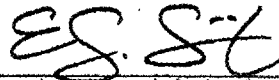
Attorneys for Defendant Joseph B. Eisenberg

[SIGNATURES CONTINUED ON FOLLOWING PAGE]

1 ADDITIONAL SIGNATURE PAGE TO
2 STIPULATION TO EXTEND BRIEFING SCHEDULE PURSUANT TO CIVIL LOCAL
3 RULE 6-2 AND [PROPOSED] ORDER

4 Dated: February 28 2007

MORVILLO, ABRAMOWITZ, GRAND, IASON,
ANELLO & BOHRER, P.C.



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Attorneys for Defendant Peter D. Welch

11 Dated: February __, 2007

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Attorneys for Defendant James J. Conway

19 GOOD CAUSE APPEARING THEREFORE, IT IS SO ORDERED THAT:

20 Defendants shall file and serve their reply briefs to the motions to dismiss on or
21 before March 13, 2007.

23 IT IS SO ORDERED.

24 Dated: _____, 2007 BY: _____

26 Honorable Martin J. Jenkins
27 United States District Court for the Northern
28 District of California

1 ADDITIONAL SIGNATURE PAGE TO
2 STIPULATION TO EXTEND BRIEFING SCHEDULE PURSUANT TO CIVIL LOCAL
3 RULE 6-2 AND [PROPOSED] ORDER

4 Dated: February __, 2007

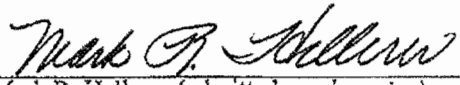
MORVILLO, ABRAMOWITZ, GRAND, IASON,
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13 Attorneys for Defendant Peter D. Welch

14 Dated: February 21, 2007

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23 Attorneys for Defendant James J. Conway

24 GOOD CAUSE APPEARING THEREFORE, IT IS SO ORDERED THAT:

25 Defendants shall file and serve their reply briefs to the motions to dismiss on or
26 before March 13, 2007.

27 IT IS SO ORDERED.

28 Dated: February 26, 2007

BY: 

Honorable Martin J. Jenkins
United States District Court for the Northern
District of California